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Just Associates to CMS/ONC: A “Technology-Alone” Solution Can’t Resolve the Patient Matching Issues Impacting Interoperability

CENTENNIAL, Colo. – June 14, 2019 – Any patient matching improvement strategy must look beyond technology and emphasize the people and processes that play a critical, yet often overlooked, role in ensuring data integrity. That was the message [Just Associates, Inc.](#), shared with the Centers for Medicare and Medicaid Services (CMS) and the Office of the National Coordinator for Health IT (ONC) in response to requests for information on patient matching in conjunction with proposed rules to advance interoperability.

In its letter to the ONC, Just Associates noted that while it supports the focus on interoperability and usability and agrees with the importance of accurate patient matching, it does not believe that the concept of a “technology-alone” solution is realistic. Any improvement strategy must also include data standardization and promote a more consistent, comprehensive collection of patient data at all entry points.

“Every technology has its flaws when it comes to patient matching and the importance of training staff, developing and maintaining comprehensive data governance policies, ensuring executive support for data governance and vigilant efforts on measuring and reporting data quality are critical. We cannot ignore the ‘people and process’ aspects to obtaining high levels data quality,” the letter stated.

Just Associates also provided feedback to the ONC on the importance of consistently defined and used format constraints and identified key issues that must be addressed to accurately measure algorithm performance. The suggestion was also made to align with the Children’s Hospital Association’s temporary demographic conventions for newborns to address the unique challenges with pediatric matching.

In its letter to CMS, Just Associates concurred with the suggestion that more standardized data elements be used across all appropriate programs to immediately enhance matching rates, noting that “data collection standards and their consistent application by health plans, providers and exchange organizations are critical for matching accuracy.

“Equally important,” the letter continued, “is the development of data definitions for these elements to ensure common understanding of exactly what data is being collected and in what format.”

Other advice offered by Just Associates in response to CMS suggestions included avoiding mandating the use of specific matching algorithms, data sources or software solutions, a move that would likely be premature and overly prescriptive. The firm also stated its support for implementation of a CMS-wide identifier, noting its potential to enhance accuracy and assist in duplicate record reconciliation verification processes.

A nationally recognized leader in patient matching and health information data integrity and management, Just Associates is highly qualified to speak to the topic of patient matching and its impact on interoperability. Over the past 17 years, the firm has provided expert services in every aspect of health data quality, including analyzing and optimizing patient matching within numerous EHR and MPI systems. This experience has provided unique insight into the ongoing challenges.

Additionally, in 2017, Just Associates collaborated with the ONC on developing the robust, synthetic data set and answer key for the Patient Matching Algorithm Challenge. That program was designed to bring about greater transparency and data on the performance of existing patient matching algorithms and allow matching technologies to improve their performance.

“We have analyzed millions of possible duplicate record matches identified by nearly every major EHR system and algorithm, and we’ve seen first-hand how over-reliance on technology can do more harm than good absent the people and processes that ensure the integrity of patient identification,” said Beth Just, MBA, RHIA, FAHIMA, founder and president of Just Associates. “We have a deep understanding of how patient demographic data and system nuances impact patient matching and a unique perspective on the capabilities and limitations of various approaches.”

The full text of Just Associates’ letters to both CMS and the ONC can be accessed [here](#).

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About Just Associates, Inc.

A recognized leader in health information data integrity and management for over 17 years, Just Associates, Inc. (www.justassociates.com) is a healthcare data integration consulting firm that delivers superior value to its clients through improved patient matching. Just Associates has the process expertise and systems knowledge to deliver tailored, value-added solutions that improve clients’ financial outcomes and business processes, support delivery of quality patient care, and meet the expectations of diverse stakeholders through improved data integrity.